

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**ARGONAUT INSURANCE
COMPANY**

Plaintiff

v.

**GENERAL TRADE
CORPORATION, SPECIALTY
STEAL PRODUCTS, INC., GULF
MATERIALS, LLC, GULF
TRADING & TRANSPORT, LLC,
CLIFFORD C. WISE, AND
BARBARA A. WISE**

Defendants

CIVIL ACTION NO. 2:20-cv-117

**PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER,
PRELIMINARY INJUNCTION AND PERMANENT INJUNCTION**

For the reasons set forth in the accompanying Brief in Support and supported by the Verified Complaint, Plaintiff, Argonaut Insurance Company ("AIC"), moves this Court pursuant to Rule 65 of the Federal Rules of Civil Procedure to issue a temporary restraining order and an injunction preliminarily and permanently compelling Defendants to perform their specific obligations under the Indemnity Agreement by deposit with AIC collateral in the amount of \$1,248,283.36 in the form of (a) an irrevocable letter of credit issued by a financial institution acceptable to AIC; (b) a pledged money market account issued by a financial institution acceptable to AIC; and/or (c) other collateral acceptable to AIC.

A proposed order of Court is attached.

Respectfully submitted,

DICKIE, MCCAMEY & CHILCOTE, P.C.

BY: /s/ W. Alan Torrance, Jr., Esquire

W. Alan Torrance, Jr., Esq. (PA ID. # 49592)

Bridget K. Sasson, Esquire (PA ID # 316859)

Two PPG Place, Suite 400

Pittsburgh, PA 15222

Tel: 412-281-7272

Fax: 412-392-5367

atorrance@dmclaw.com

bsasson@dmclaw.com

*Counsel for Plaintiff, Argonaut Insurance
Company*

Dated: January 24, 2020